WILLIAM J. GEDDES 1 Nevada Bar No. 6984 KRISTEN R. GEDDES Nevada Bar No. 9027 THE GEDDES LAW FIRM, P.C. 1575 Delucchi Lane, Suite 206 Reno, Nevada 89521 Phone: (775) 853-9455 Fax: (775) 299-5337 Email: Will@TheGeddesLawFirm.com Email: Kristen@TheGeddesLawFirm.com Attornevs for Plaintiffs Ron Schreckengost and Elizabeth Walsh 8 9

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

RON SCHRECKENGOST, an individual, and ELIZABETH WALSH, an individual,

Plaintiff,

VS.

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THE STATE OF NEVADA ex rel. the NEVADA DEPARTMENT OF CORRECTIONS: and PERRY RUSSELL, an individual.

Defendants.

CASE NO: 3:19-cv-00659-MMD-CLB

STIPULATION, REQUEST, AND **ORDER** ENLARGING TIME FOR PLAINTIFFS TO OPPOSE DEFENDANTS' TWO MOTIONS TO DISMISS (ECF 069 and ECF 070)

(THIRD REQUEST)

The parties to this action, by and through their undersigned counsel of record hereby stipulate that Plaintiffs may have a 1-day extension of time to file their opposition briefs to Defendants' two motions to dismiss (ECF 069 and ECF 070), through and including Tuesday, December 1, 2020, Pursuant to this stipulation, the parties hereby request that the Court grant this enlargement of time. This is the third request for such an extension. The current deadline to file these two opposition briefs is Monday, November 30, 2020, which deadline has not yet run. The reasons that additional time is requested here is because Plaintiff's Counsel underestimated the amount of time it would take to complete these opposition briefs, when requesting an additional extension, given the fact that he had been and continued to be quite busy with many pressing matters in other cases. As well, the offices of Plaintiff's Counsel were closed for the Thanksgiving Holiday, November 26-27, 2020, which

1	necessitates an extension for one additional day, immediately following the Thanksgiving holiday.
2	This stipulation and request are not made for any dilatory or improper purpose.
3	Dated this 30th Day of November.  THE GEDDES LAW JIRM, P.C.
4	Dated this 30th Day of November.  THE GEDDES LAW FIRM, P.C.
5	WILLIAM J. GEDDES
6 7	Nevada Bar Number 6984 The Geddes Law Firm, P.C. 1575 Delucchi Lane, Suite 206
8	Reno, Nevada 89502 (775) 853-9455
9	Attorneys for Plaintiffs Ron Schreckengost and Elizabeth Walsh
10	waisn
11	Dated this 30 <sup>th</sup> Day of November . AARON D. FORD Nevada Attorney General
12	Electronic Signature Authorized
13	
14	/s/ Scott Husbands BRANDON R. PRICE Senior Deputy Attorney General
15	Nevada Bar No. 11686 SCOTT H. HUSBANDS
16 17	Deputy Attorney General Nevada Bar No. 11398
18	State of Nevada Office of the Attorney General
19	5420 Kietzke Lane, Suite 202 Reno, NV 89511 (775) 687-2121 (phone)
20	Attorneys for Defendants, State of Nevada ex rel. its Department of
21	Corrections and Perry Russell
22	ORDER
23	
24	Dated: December 1, 2020 IT IS SO ORDERED
25	
26	and the second
27	UNITED STATES DISTRICT JUDGE
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## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **November** 30, 2020, I caused to be served a copy of the foregoing *Stipulation, Request, and [Proposed] Order Enlarging Time for Plaintiffs to Oppose Defendants' Two Motions to Dismiss (ECF 069 and ECF 070) (Third Request)*, by filing the same with the Court's electronic filing system (PACER), addressed to the following:

AARON D. FORD

Nevada Attorney General BRANDON R. PRICE

Senior Deputy Attorney General

SCOTT H. HUSBANDS Deputy Attorney General

State of Nevada Office of the Attorney General

5420 Kietzke Lane, Suite 202

Reno, NV 89511

Attorneys for Defendants, State of Nevada ex rel. its Department of Corrections and Perry Russell

WILLIAM J. GEDDES

An employee of the Geddes Law Firm, P.C.